

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 43,

Plaintiff,

vs.

JEFFREY EPSTEIN, GHISLAINE
MAXWELL, SARAH KELLEN, LESLEY
GROFF, AND NATALYA MALYSHEV

Defendants.

CASE NO. 17 Civ 616 (JGK)

DECLARATION OF MICHAEL C. MILLER

I, Michael C. Miller, hereby declares as follows:

1. I am an attorney at the law firm of Steptoe & Johnson LLP, counsel for Defendants Jeffrey Epstein and Lesley Groff (“Defendants”). I submit this declaration in support of Defendants’ motions to dismiss, or, in the alternative, to strike a portion of the First Amended Complaint, and to require Plaintiff to proceed in her own name.

2. Attached hereto as exhibits are true and correct copies of the following:

Exhibit A The First Amended Complaint filed in this action.

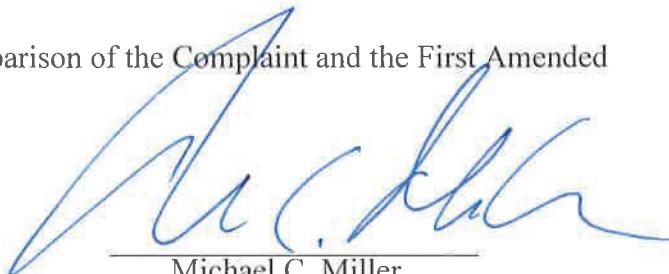
Exhibit B The Complaint filed in this action.

Exhibit C A letter I wrote to Plaintiff’s counsel of May 15, 2017.

Exhibit D A letter Plaintiff wrote to the New York Times and published on November 16, 2017.

Exhibit E A blackline comparison of the Complaint and the First Amended Complaint.

Dated: November 21, 2017



Michael C. Miller